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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
AT SAN FRANCISCO**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, AFL-CIO,
et al.,

Plaintiffs,

v.

UNITED STATES OFFICE OF
PERSONNEL MANAGEMENT, et al.,

Defendants.

NO. 3:25-cv-01780-WHA

PLAINTIFF STATE OF
WASHINGTON'S CORRECTED
MOTION FOR PRELIMINARY
INJUNCTION

APRIL 9, 2025, 8:00 AM

CORRECTED MOTION FOR PRELIMINARY INJUNCTION

TO DEFENDANTS:

PLEASE TAKE NOTICE that as soon as counsel may be heard in Courtroom 12, 19th Floor, United States District Court, Northern District of California, located at 450 Golden Gate Avenue, San Francisco, CA, Plaintiff State of Washington will move the Court pursuant to Rule 65 of the Federal Rules of Civil Procedure and Rule 65-1 of the Civil Local Rules for a preliminary injunction to:

1. Order that the relief this Court previously awarded to organizational Plaintiffs in its amended Temporary Restraining Order dated March 13, 2025, Dkt. No. 44, and in its oral and written decisions granting preliminary injunctive relief, Dkt. Nos. 120, 132, extends to the State of Washington.

2. Order relief Defendants the Department of Agriculture, the Department of Commerce, the Department of Defense, the Department of Education, the Department of Health and Human Services, the Department of Homeland Security, the Department of Housing and Urban Development, and the Department of the Interior to comply with all provisions of the order referenced in 1, above, including immediately offering reinstatement to any and all probationary employees terminated since January 20, 2025, ceasing any and all use of the template termination notice provided by Defendant OPM and/or Acting Director Ezell since January 20, 2025, immediately advising all probationary employees terminated since January 20, 2025, that the notice and termination has been found to be unlawful by the United States District Court for the Northern District of California, and ceasing any termination of probationary employees at the direction of defendants OPM and Acting Director Ezell.

3. Order that any terminations of these agencies' employees may only be made by the agencies themselves in conformity with the Civil Service Reform Act and the Reduction in Force Act and any other Constitutional or statutory requirement.

4. Order that in seven calendar days from the date of the Court's order, relief defendants Department of Commerce, Department of Education, Department of Health and Human Services, Department of Homeland Security, and Department of Housing and Urban Development shall submit a list of all probationary employees terminated since January 20, 2025, with an explanation as to each of what has been done to comply with this Order.

This Motion is supported by the accompanying Memorandum in Support of Plaintiff State of Washington's Motion for Preliminary Injunction; the Declarations of Alexandra Avila and Cynthia Alexander; and the complete records filed in this case.

DATED this 28th day of March 2025.

NICHOLAS W. BROWN
Attorney General

/s/ Cynthia L. Alexander

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